

EXHIBIT B

From: [Berkovits, Michael](#)
To: [Brown, Nancy A](#)
Cc: [Chandrasekhar, Charu](#); [Paley, Michael D.](#); [Bromberg, Katherine](#); [Daniels, Jon](#); [Lee, Randall R.](#); [Johnstone, Chris](#)
Subject: RE: UPS Delivery Notification, Tracking Number 1Z88R5V42491771610
Date: Thursday, July 11, 2019 3:00:07 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Nancy,

If you review the productions, you will see that the same documents were produced. The first production volume included a set of emails in Gmail format, where several emails were displayed in a single thread, with metadata visible on the face of the emails. Those same emails have now been produced in native format.

With respect to your contention that our document requests do not clarify whether we searched for responsive documents after the filing of the Complaint, our responses and objections to your document requests state, as is typical and appropriate, that “Mr. Ladd will . . . not produce documents created after September 7, 2018 [i.e., the filing of the Complaint].” Our response is clear that we are not producing such documents given the burden of collecting and reviewing documents that are highly likely to be privileged, and thus we will not be searching for or logging any such documents.

With respect to your document productions, we request that you please make future productions directly to our upload center at the following address:

Christina Hancock
WilmerHale
60 State Street
Boston, MA [02109](#)

Thanks,
Michael

Michael J. Berkovits

Cooley LLP
55 Hudson Yards
New York, NY 10001-2157
Direct: +1 212 479 6234 • Fax: +1 212 479 6275
Email: MBerkovits@cooley.com • www.cooley.com

From: Brown, Nancy A <BrownN@SEC.GOV>
Sent: Wednesday, July 10, 2019 1:53 PM
To: Berkovits, Michael <mberkovits@cooley.com>; Lee, Randall R. <randall.lee@cooley.com>
Cc: Chandrasekhar, Charu <ChandrasekharC@SEC.GOV>; Paley, Michael D. <PaleyM@SEC.GOV>;

Bromberg, Katherine <BrombergK@SEC.GOV>; Daniels, Jon <danielsj@SEC.GOV>

Subject: FW: UPS Delivery Notification, Tracking Number 1Z88R5V42491771610

Randall and Michael,

Please see below.

Could you also please explain your production on July 8, 2019? My processing unit doesn't understand it since it contains 15 documents, but the 05/23/19 production, which we understood you were replacing, contained only 12.

Also, we've asked you some questions about your document response and have gotten no reply. Please see attached email.

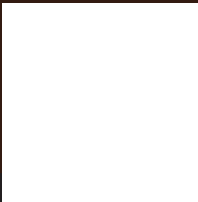
From: UPS Quantum View <pkginfo@ups.com>

Sent: Wednesday, July 10, 2019 1:27 PM

To: Brown, Nancy A <BrownN@SEC.GOV>

Subject: UPS Delivery Notification, Tracking Number 1Z88R5V42491771610

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Your package has been delivered.

Delivery Date: Wednesday, 07/10/2019

Delivery Time: 10:20 AM

At the request of SEC NEW YORK REGION this notice alerts you that the status of the shipment listed below has changed.

Shipment Detail

Tracking Number:

1Z88R5V42491771610

Ship To:

Randall R. Lee, Esq.
Cooley LLP
1333 2ND ST
FLOOR 4 ROOM 400
SANTA MONICA, CA 90401
US

UPS Service:

UPS NEXT DAY AIR

Number of Packages:

1

Shipment Type:

Letter

Delivery Location: OFFICE
MARIAH

Signature Required: A signature is required for package delivery

Reference Number 1: 66211



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